



COMANCHE PUBLIC SCHOOLS

Terry Davidson, Superintendent

December 4, 2014

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Sir/Madame,

I am writing today in response to FCC Chairman Tom Wheeler's recently announced proposal to raise the E-Rate funding cap by \$1.5 billion. The E-Rate program currently represents the only source of federal funding aimed at educational technology and is critical in providing discounts to assist schools (like mine) to obtain affordable telecommunications and internet access. As Superintendent of Comanche Public Schools in Comanche, Oklahoma, I strongly support the infusion of the additional funding, and urge you to do the same.

Comanche School District, located in a rural area in southern Oklahoma, serves approximately 1100 students, drawn from a geographic area covering 143 square miles. The student poverty rate, which exceeds 50% participation in the NSLP, coupled with a low per student expenditure makes local district spending for online connectivity and network infrastructure challenging at best. E-Rate funding has historically been the only option for advancing the district's ambitious effort to provide the bandwidth access that is mandatory for students to succeed in the global economy of the 21st Century. The district has leveraged past E-Rate funding to install a wired infrastructure purposely designed to support existing end user wired devices as well as a planned Wi-Fi expansion to support the emerging needs of mobile learning. The cost of the mobile expansion, which exceeds projected combined local and E-Rate funding for our district, will be significantly enhanced with the support of the proposed additional funding.

To raise the cap of the E-Rate program by \$1.5 billion, the Universal Service Fund fee will increase by 16 cents per month per account. 16 additional cents per month—less than half a penny per day—totals to an additional \$1.92 per year, approximately the cost of a cup of coffee. This proposal is both reasonable and justified, asking contributors to forgo one cup of coffee over the course of a year to ensure that our nation's schools and libraries are connected to the internet in a way that supports 21st century learning and prepares them for post-secondary opportunity.

No one questions that it is time to ensure that our libraries and schools are connected with the quality of connectivity that is sufficient and scalable for today's ever-growing connectivity needs. In less than twenty years since Congress established the program, E-Rate played a critical role in transforming levels of connectivity from less than one-quarter of schools and libraries to nearly all connected today. The E-Rate program's work is not done: Achieving the laudable broadband goals adopted by the Commission in July will require additional investment. The biggest obstacle the E-Rate program faces, even with the recent changes, remains the strain of increasing demand for E-Rate-supported services and persistently low funding.

The single most effective step the FCC can take to bolster E-Rate's current and future success is to ensure that the program's funding is adequate to support, in a sustainable manner, the program's changes and goals as adopted in July. Chairman Wheeler's proposal does just that, representing a deliberate effort to expand educational opportunities for our nation's students. By focusing on high-capacity broadband connections to the internet (particularly those in rural communities) and providing sustained, additional funding to the E-Rate program, the modernized E-Rate will ensure the nation's schools—including mine—are able to keep pace with ever increasing connectivity needs.

The greatest challenge for our district is to support the transition of the learning environment to a mobile anytime anywhere model. The needs of students and teachers in the new and emerging mobile world require ubiquitous and uniform access to appropriate end-user devices supported by readily available Wi-Fi bandwidth. The cost of this necessary expansion far exceeds available local resources. It is our hope that E-Rate will be increased to enable rural schools in general, and our district in particular, to move forward with the transition to a truly modern mobile learning environment.

Thank you for considering my response as you move forward with your decision on the E-Rate program and its funding. I applaud Chairman Wheeler and the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program.

Sincerely,

A handwritten signature in blue ink, appearing to be "Terry Davidson", with a large, stylized "D" and a horizontal line extending to the right.

Terry Davidson
Superintendent